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April 5, 1993

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Attn: Chief, Allocations Branch

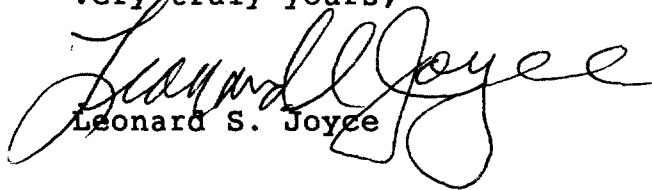
Re: Petition For Rule Making
FM Allocations
Lebanon, Ky

Dear Ms. Searcy:

Forwarded herewith on behalf of Lebanon-Springfield
Broadcasting Company Inc., is its Petition for Rule Making to
amend FM allocations at Lebanon, Ky.

Should there be any questions concerning this matter,
please communicate directly with the undersigned.

Very truly yours,


Leonard S. Joyce

Enclosure

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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

ORIGINAL

In the Matter of)
)
Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations)
)
(Lebanon, Ky))

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APR 5 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Chief, Allocations Branch

Petition for Rule Making

Lebanon-Springfield Broadcasting Company Inc. (Petitioner), licensee of Station WLSK(FM), Lebanon, Ky, by and through its counsel, requests that the Commission institute a Rule Making Proceeding, to modify its FM Table of Allotments, §73.202(b) of the Commission's Rules, to substitute Channel 265C3 for Channel 265A at Lebanon, Ky, and to modify the License of Station WLSK(FM) to specify operation on Channel 265C3. In support hereof, the following matters are set forth.

1. Station WLSK(FM) Lebanon, Ky, licensed to Petitioner, presently is licensed to operate (and does now operate) on Channel 265A. The purpose of this Petition is to request an upgrade from Channel 265A to Channel 265C3, which will result in greater needed coverage, and, a more efficient use of the frequency, in the public interest. Accordingly, the Table of Allotments would be changed as follows:

<u>City</u>	<u>Channel No</u>	
	<u>Present</u>	<u>Proposed</u>
Lebanon, Ky	265A	265C3

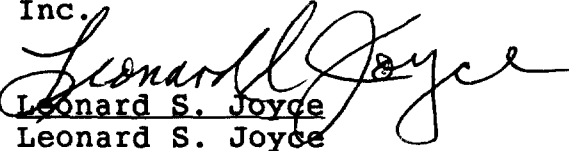
2. Attached hereto is a Technical Report prepared by Petitioner's Consulting Engineer, establishing that the allocation of Channel 265C3 can be accomplished consistent with all Commission Rules and Regulations, including the mileage separation requirements, from the specified reference point. Also, as set forth, in the attached Technical Report, the requested upgrade to Channel 265C3 will result in increased 1mv/m coverage to an area of 3,132 square kilometers, wherein 65,431 reside, thus providing Lebanon, Ky with its first wide area FM service. Such will serve the public interest.

3. When and if allocated, Petitioner shall promptly apply for operation on Channel 265C3 and when granted, promptly construct and commence operation.

Wherefore, the premises considered, it is respectfully requested that the Commission issue a Notice of Proposed Rule Making, proposing modification of its Table of Allotments to substitute Channel 265C3 for Channel 265A at Lebanon, Ky, and, concurrently modify the license of Station WLSK(FM) to specify operation on Channel 265C3.

Respectfully Submitted,

Lebanon-Springfield Broadcasting
Company Inc.

By: /s/ 
Leonard S. Joyce

Its Attorneys

Blair, Joyce & Silva
1825 K Street, N.W.
Suite 510
Washington, D.C. 20006

April 5, 1993

TECHNICAL REPORT

LEBANON SPRINGFIELD BROADCASTING COMPANY, INC.

REQUESTS:

UPGRADE OF STATION WLSK(FM) TO 265C3 (100.9 MHz)

LEBANON, KENTUCKY

MARCH 18, 1993

**CHARLES M. ANDERSON
BROADCAST CONSULTANT
1519 EUCLID AVENUE
(502)781-2067**

TECHNICAL REPORT

This technical report has been developed in support of a petition for rulemaking by Lebanon Springfield Broadcasting Company Inc. requesting the on channel upgrade of station WLSK at Lebanon, KY from 265A to 265C3. The upgrade may be accomplished without any other changes in the table of allocations, and is consistent with all pending applications and rulemakings.

I.

265C3 UPGRADE ALLOCATION ANALYSIS

Upgrade of the Lebanon, KY 265A facility to 265C3 is proposed at an arbitrary reference point chosen to accomplish full clearance to all pending rulemakings:

N 37-26-02 W 85-08-43 (17.88 km southeast).

The 265C3 reference point is 17.88 km (11.1 miles) from the Lebanon reference point (N 37-34-18 W 85-15-00) at an azimuth of 148.9 degrees True. An allocation study included as Exhibit E-1 demonstrates that the proposed upgrade meets Section 73.207 clearances to all existing applications and protected rulemakings. Exhibit E-2 shows the area within which a transmitter site for 265C3 may be located. That area will be increased by the ordered substitution for WMPI at Scottsburg, IN (MM Docket No. 88-315) to make way for the upgrade of WBDC at Huntingburg, Indiana.

II.

70 DBU SERVICE AND LINE OF SIGHT TO LEBANON

The proposed 265C3 upgrade will easily encompass the city of Lebanon with a 70 dBu contour. Exhibit E-3 depicts a uniform, maximum C3 facility 70 dBu (23 km) and a 70 dBu based on actual terrain from the arbitrary reference point. Terrain was obtained from the N.G.D.C. 30 second database, and the 70 dBu calculated with a computer program which utilizes the Commissions Section 73.333 data points and F5050 algorithm.

Line of sight from the 265C3 reference point to the Lebanon, KY reference point is demonstrated in the terrain plot (Exhibit E-4) along the 328.9 degree True radial. Terrain data was obtained at .25 mile intervals directly from 7.5 minute topographic maps. Care was exercised not to miss any high elevations which would impact line of sight. Exhibit E-4 demonstrates that a radiation center at 482 meters AMSL (1120 ft AMSL site + 480 ft tower) will achieve line of sight over the entire city of Lebanon. Examination of the area within which the upgrade may be located indicates that there are sites with higher elevations which would require less tower to achieve line of sight.

III.

POPULATION AND AREA GAINS

Population comparisons were obtained by superimposing

the actual 60 dBu for the licensed WLSK 265A facility and a uniform 39.1 km 60 dBu for a maximum C3 facility (25 kw/ 100 meters HAAT) on the 1990 Census Map of Counties, County Subdivisions and Places. Where the contours bisected a census subdivision, the relative area included was determined. Uniform distribution of population within subdivisions was assumed. The contour areas were determined by numerical integration.

The 265C3 60 dBu will serve an area of 4,803 square kilometers, an increase of 3,132 square kilometers (+187.4%). The contour will include a population of 90,876, an increase of 65,431 (+257%) over the existing licensed WLSK facility. Exhibit E-5 shows the existing class A and upgraded C3 60 dBu contours.

III.

CONCLUSION

The proposed upgrade of the WLSK 265A licensed facility at Lebanon, Kentucky (6,590 population) to 265C3 will provide that community with its first wide area FM service. Furthermore, considerable public interest benefit will be gained through the 65,431(+257%) increase in population and 3,132 ((+187.4%) square kilometer increase in area served.

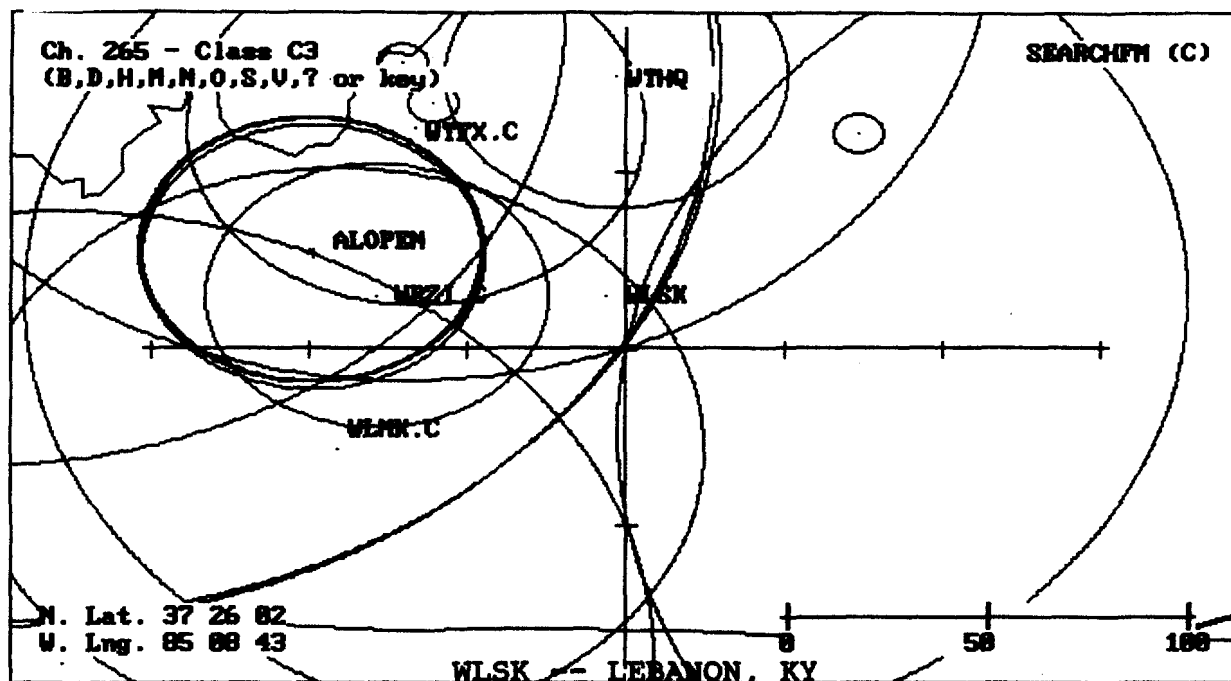
The upgrade is cochannel and clearly mutually exclusive with the authorized facility. Therefore, no competing expressions of interest are permissible under the Commission's upgrade rules. It is concluded that the upgrade

can be accomplished in full compliance with the Commission's allocations rules and policies.

SUMMARY OF ALLOCATION PROPOSAL

City	Present	Proposed	Coordinates
Lebanon, KY	265A	265C3	N 37-26-02 W 85-08-43 17.88km SE

**EXHIBIT E-1
ALLOCATION PLOT**



Search 03-18-93

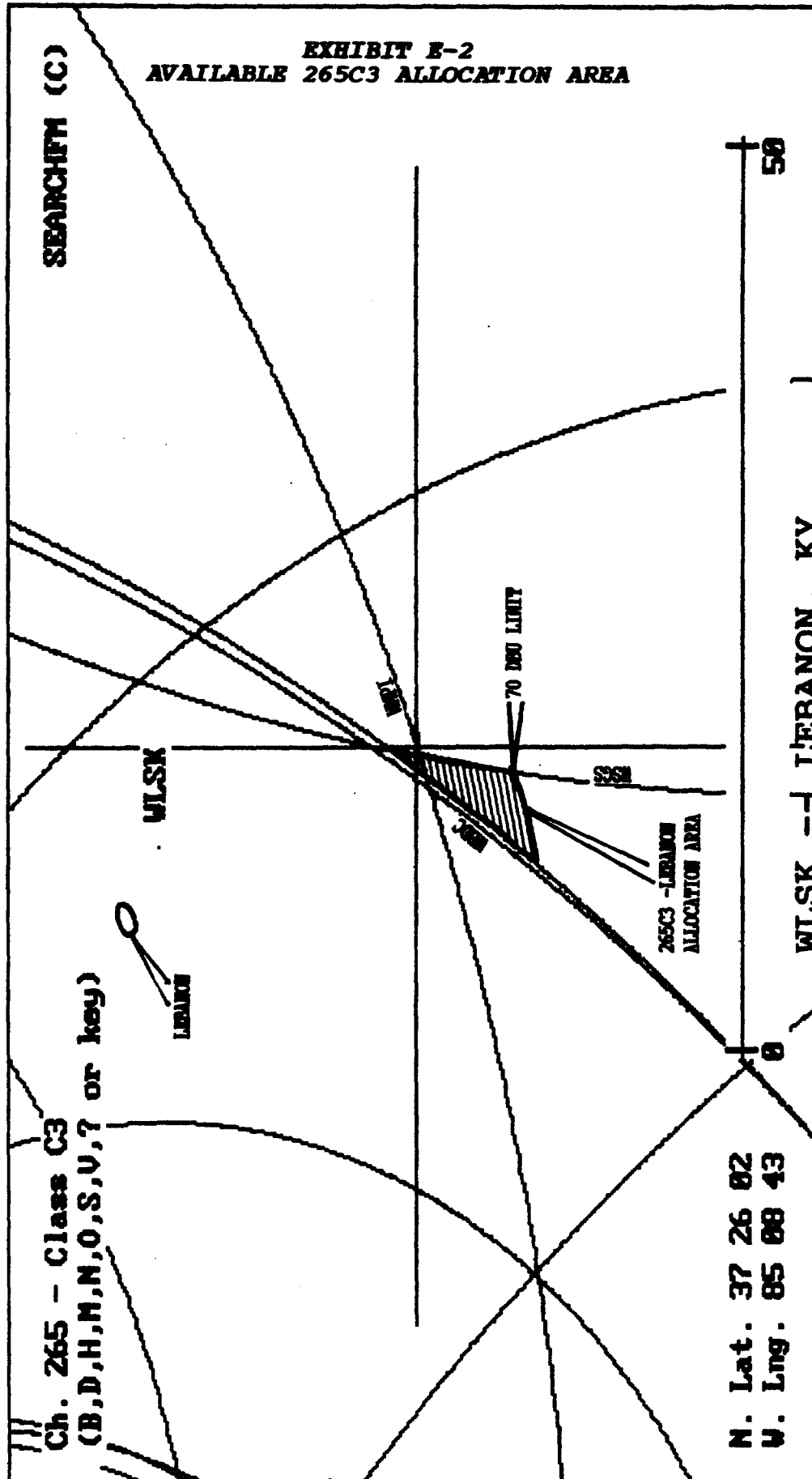
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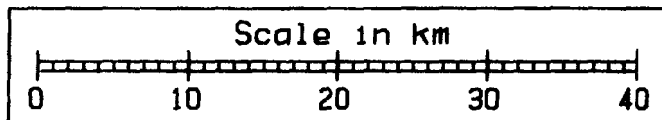
Current rules spacings

CHANNEL 265 -100.9 MHz

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN	
WLSK	265A	Lebanon	KY	342.9	17.74	142.0	-124.26	*
WLMK.C	264A	Horse Cave	KY	245.5	77.12	89.0	-11.88	* (1)
WMPI	265A	Scottsburg	IN	337.9	142.09	142.0	0.09	<
WSGS	266C	Hazard	KY	98.7	176.14	176.0	0.14	<
ALOPEN	265B1	Huntingburg	IN	299.8	176.42	175.0	1.42	<
WBDC.A	265B1	Huntingburg	IN	299.1	176.82	175.0	1.82	<
WRZI.C	268A	Buffalo	KY	285.3	63.59	42.0	21.59	
WBVR	266C1	Russellville	KY	233.7	170.25	144.0	26.25	
WTFX.C	263C2	Louisville	KY	323.5	86.90	56.0	30.90	
WRZI.A	268A	Vine Grove	KY	290.6	82.17	42.0	40.17	
WRZI.A	268A	Vine Grove	KY	292.6	82.43	42.0	40.43	
ALOPEN	268A	Vine Grove	KY	292.3	83.53	42.0	41.53	
WTHQ	267A	Shelbyville	KY	358.5	86.54	42.0	44.54	
WBDC	265A	Huntingburg	IN	303.5	189.15	142.0	47.15	

1. Channel 294A substituted per MM Docket No. 91-271.





1: 500, 000

INTERCHK

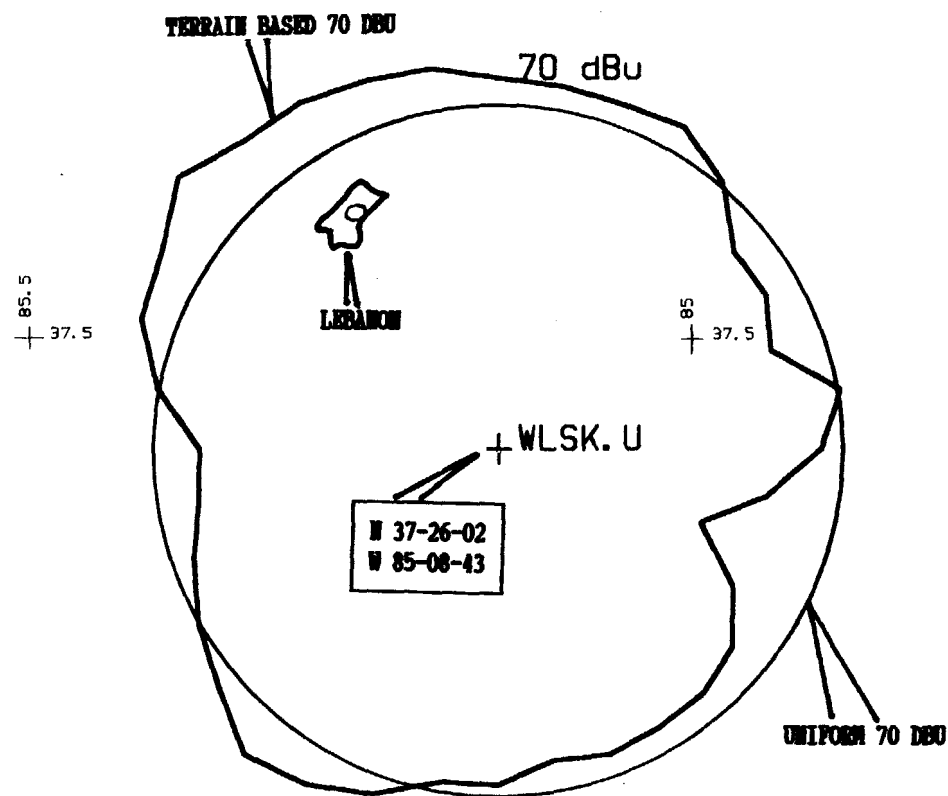


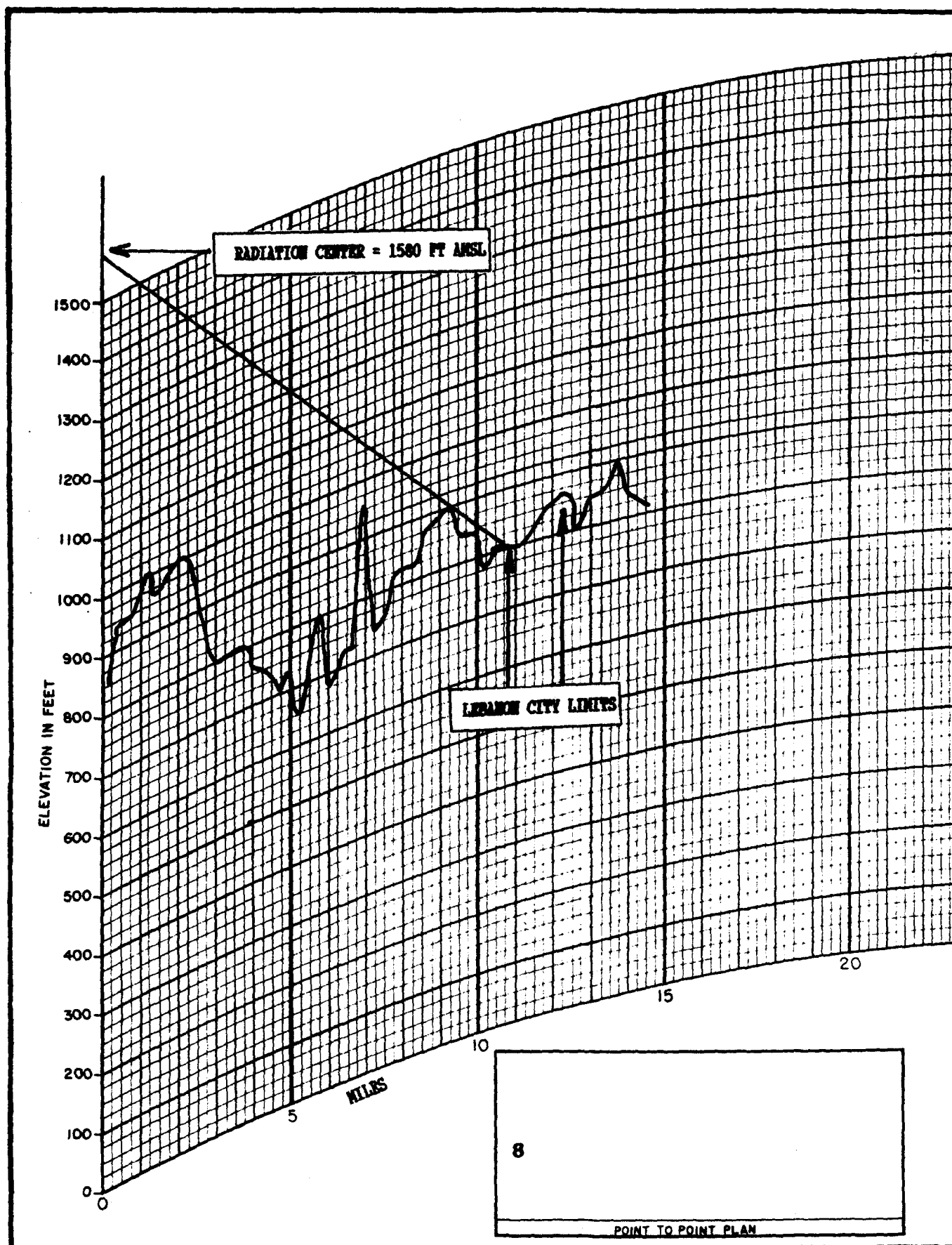
EXHIBIT B-3

WLSK. UP 265C3 - 25kW

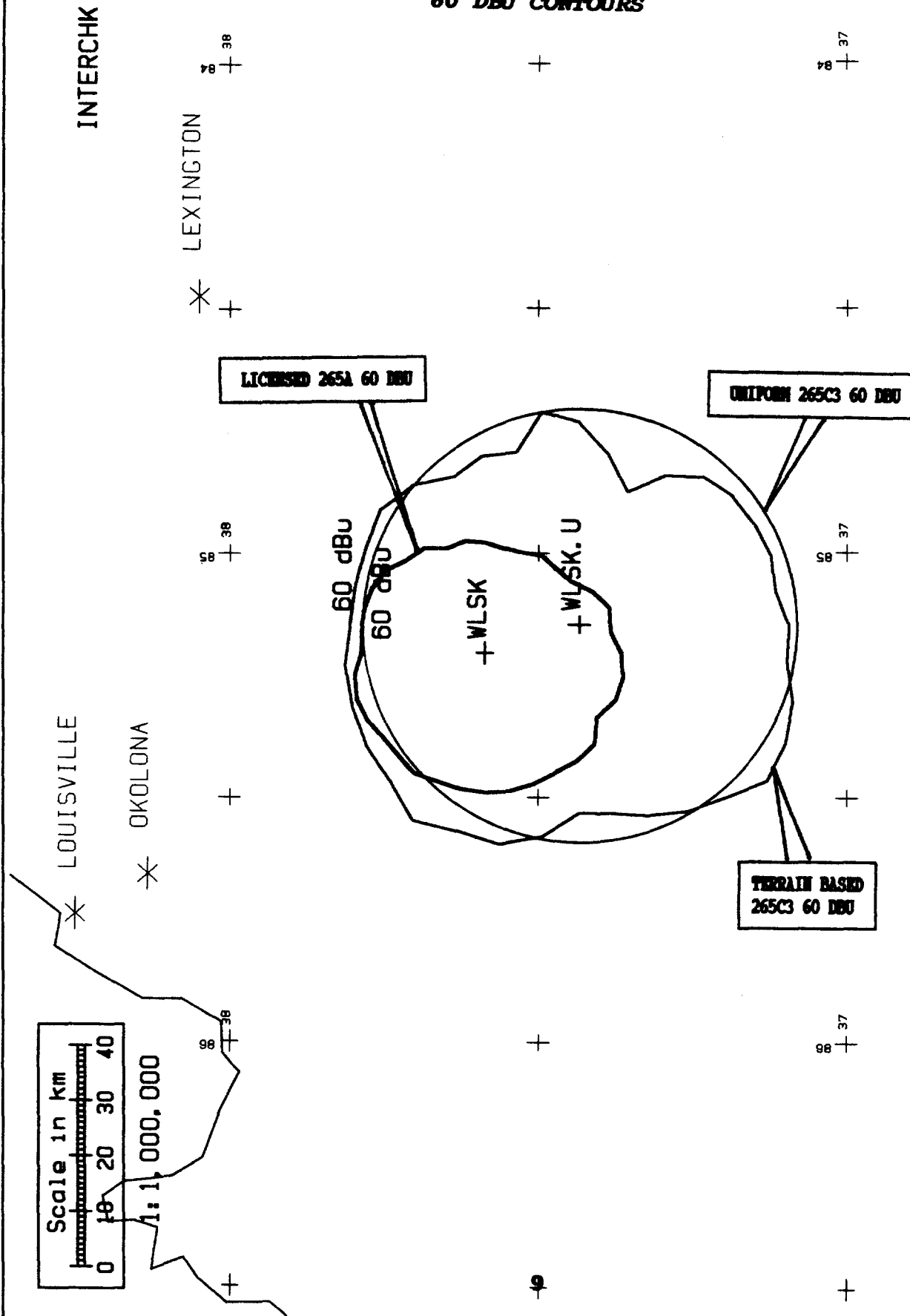
N. Lat. 37 26 02

W. Lng. 85 08 43

EXHIBIT E-4
TERRAIN PLOT - 328.9 DEGREE -TRUE



**EXHIBIT E-5
COMPARISON OF 265A AND 265C3
60 DBU CONTOURS**



WLSK. UP 265C3 - 25kW WLSK - BLH791120AD 265A - 3kW

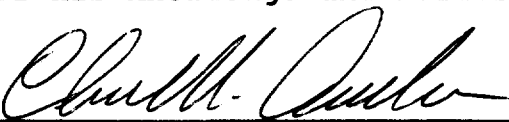
CERTIFICATION

Charles M. Anderson hereby certifies that;

His qualifications in broadcast allocation matters are a matter of record before the Federal Communications Commission having been presented and accepted on many occasions in the past;

That he holds a lifetime General Radiotelephone license(#PG-6-7352) , a bachelors degree in the physical sciences from Western Kentucky University and advanced degrees in the communications field from the University of North Carolina and Indiana University;

That the accompanying technical report and exhibits were developed by him personally or under his immediate supervision and that all the information presented therein is true and correct to the best of his knowledge and belief.

/s/ 
Charles M. Anderson

March 18, 1993

Disclaimer: Charles M. Anderson assumes no liability for any errors or omissions in the information, exhibits and report provided herein; and, shall not be liable for any injuries or damages (including consequential) which might result from use of said information, exhibits and report.

Filing of this report with the Federal Communications Commission constitutes acceptance in full of the terms and conditions stated above.

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